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7
8 UNITED STATES DISTRICT COURT
9 EASTERN DISTRICT OF CALIFORNIA, SACRAMENTO DIVISION
10

11 ALFREDO KUBA,)
12 Plaintiff,)

13 v.)

14)
15 MARINE WORLD JOINT POWERS
AUTHORITY, et al.,)

16 Defendant.)
17 _____)

Case No. 2:05-CV-00794-WBS-JFM
[PROPOSED] STIPULATION

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19 The original Complaint in the above-entitled action was filed on April 20, 2005. On July
20 26, 2005, the Court issued its Status (Pretrial Scheduling) Order. On February 28, 2006, the
21 Court signed the Order Granting Leave to Add Defendants by Substituting Ray Matela, Chris
22 Nevasca, Micah Baker and Ron Cervantez for Does 1-4.

23 As of the date of this Stipulation, the parties have not completed discovery. Dispositive
24 motions would necessarily be predicated on said discovery.

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**STIPULATION TO EXTEND DISCOVERY AND DISPOSITIVE MOTION
CUT-OFF DATE**

IT IS HEREBY STIPULATED pursuant to Rule 15(a) of the Federal Rules of Civil Procedure, by and between Corey A. Evans, counsel for Plaintiff; Alesia Jones-Martin, counsel for Defendants Marine World Joint Powers Authority, City of Vallejo, Vallejo Police Department, Lieutenant Salinas, Officer Douglas Wilcox, Sergeant Schroeder, Officer Thompson, Officer Hammrick, and Officer Bautista; and Michael L. Amaro, counsel for Defendants Six Flags Themes Parks, Inc., dba Six Flags Marine World, Joe Meck, Dale Arnold, Aaron Arky, Ray Matela, Chris Nevasca, Micah Baker and Ron Cervantez, that the parties may conduct discovery beyond the date specified by the Court's Status (Pretrial Scheduling) Order, April 28, 2006.

The parties further stipulate that the parties may file dispositive motions to be heard no later than September 1, 2006, ninety-five (95) days before trial.

The parties further stipulate to continue the Pre-Trial Conference, presently set for August 14, 2006, at 10:00 a.m., to October 23, 2006, at 10:00 a.m.

The parties further stipulate to continue the Trial of this matter, presently set to commence on October 3, 2006, at 9:00 a.m., to December 5, 2006, at 9:00 a.m.

IT IS SO STIPULATED.

DATED: May 3, 2006 /s/ - Alesia Jones-Martin
ALESIA JONES-MARTIN
Assistant City Attorney
Attorney for Defendants,
MARINE WORLD JOINT POWERS
AUTHORITY, et al.


DATED: May 16, 2006 /s/
MICHAEL L. AMARO
Attorney for Defendants SIX FLAGS
THEMES PARKS, INC., dba SIX FLAGS
MARINE WORLD, et al.

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DATED: May 4, 2006 /s/
COREY A. EVANS
Attorney for Plaintiff

IT IS SO ORDERED.

DATED: May 17, 2006


WILLIAM B. SHUBB
UNITED STATES DISTRICT JUDGE

stip2